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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS, EASTERN  
DIVISION**

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In Re:	)	Case No.: 20-17850
Jasminka Kostic, and	)	
Slobodan Vasiljevic	)	
	)	
	)	Chapter 13
Debtor.	)	
	)	Judge Jack B. Schmetterer
	)	

TO: See attached service list

PLEASE TAKE NOTICE that on the December 9, 2020 at 10:00 a.m., I will appear before the Honorable Jack B. Schmetterer, or any judge sitting in that judge's place and present the motion of Jasminka Kostic and Slobodan Vasiljevic to Sell Property and Shorten Notice, a copy of which is attached.

**This motion will be presented and heard electronically using AT&T Teleconference.** No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must call this toll-free number: 1-877-336-1839. Then enter access code 3900709 followed by the pound (#) sign.

**If you object to this motion** and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

Jasminka Kostic and Slobodan Vasiljevic  
By: Joseph Olstein  
Joseph Olstein  
10450 S. Western Ave.  
Chicago, IL 60643  
312-725-4132  
joseph@olsteinlaw.com

**CERTIFICATE OF SERVICE**

I, Joseph Olstein, certify that I served a copy of this Notice and the attached motion on each entity shown on the attached list at the address shown and by the method indicated on the list on the 2<sup>nd</sup> Day of December, 2020.

Attached Service List

Amex  
P.o. Box 981537  
El Paso, TX 79998

Internal Revenue Service  
PO Box 7346  
Philadelphia, PA 19101-7346

Bank Of America  
Po Box 982238  
El Paso, TX 79998

Jasminka Kostic MD S.C.  
6150 North Kirkwood  
Chicago, IL 60646

Cap1/neimn  
Po Box 30253  
Salt Lake City, UT 84130

Jpmcb Card  
Po Box 15369  
Wilmington, DE 19850

Citi  
Po Box 6190  
Sioux Falls, SD 57117

Latimer Levay Fyock, LLC  
55 W. Monroe  
Suite 1100  
Chicago, IL 60603

Citicards Cbna  
Po Box 6217  
Sioux Falls, SD 57117

National Loan Acquisitions Company  
s/i/i Bank of America  
9126 SW Riddler RD  
Wilsonville, OR 97070

Cook County Clerk  
118 N. Clark Street  
Room 434  
Chicago, IL 60602

Nordstrom/td Bank Usa  
13531 E. Caley Ave  
Englewood, CO 80111

Cook County Treasurer  
118 N. Clark Street  
Room 112  
Chicago, IL 60602

Phh Mortgage Services  
1 Mortgage Way  
Mount Laurel, NJ 08054

Illinois Department of Revenue  
PO Box 64338  
Chicago, IL 60664-0338

Pnc Bank, N.a.  
Po Box 3180  
Pittsburgh, PA 15230

United States of America  
Bissell, US Attorney's Office  
219 S. Dearborn, 5th Floor  
Chicago, IL 60604

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	)	
	)	Chapter 13
Debtor.	)	
	)	Judge Jack B. Schmetterer

**DEBTORS' MOTION TO APPROVE SALE OF REAL PROPERTY AND  
SHORTEN NOTICE**

The Debtors, by and through their attorney Joseph M. Olstein, and for their

**MOTION TO APPROVE SALE OF REAL PROPERTY AND SHORTEN  
NOTICE** states as follows:

1. Debtor filed the instant voluntary petition under Chapter 13 of the Bankruptcy Code on 09/29/2020, and their plan is not yet confirmed
2. The Debtor owns a residence, 6150 N. Kirkwood in Chicago, IL 60646.
3. The property is secured by a first mortgage in favor of PHH mortgage for an estimated amount of \$429,683.00.
4. Additionally, the property is secured by a bond posted in favor of the United States of America, pursuant to a criminal matter involving the Debtor.
5. The Debtors negotiated a sale of their real property in the amount of \$575,000.00. See the Sales Contract attached as exhibit A.
6. Currently, a sale of the property would yield \$0.00 for the Debtor's bankruptcy estate after payment of these liens.
7. However, the Debtor needs to retain counsel to defend her in her criminal proceeding.

8. As such, the Debtor's daughter agreed to pledge her home as collateral for the bond so that the Debtor can consummate a sale on her property.
  9. After the United States of America releases their bond, the Debtors anticipate receiving net proceeds in the amount of roughly \$90,000.00, of which \$30,000.00 is exempt as a homestead exemption pursuant to 735 ILCS 5/12-901.
  10. The Debtor needs the remaining \$60,000.00 to retain competent defense counsel for trial in the underlying criminal matter.
  11. The Debtor plans on increasing the dividend to their unsecured creditors so that the creditors receive at least \$60,000.00 during the plan, or the equivalent of the net proceeds received in the sale, less the debtor's homestead exemption.
  12. Retaining competent counsel for the criminal matter benefits the estate as it allows the Debtor to continue receiving her social security income and funding her bankruptcy plan.
  13. Finally, the Debtor requests that this motion be heard on shortened notice as the deadline to close this transaction is December 11, 2020, and the buyer's mortgage commitment may expire if the closing is not consummated by that date.
- A. Allowing the sale of the Debtor's real property per the attached contract;
- B. Grant such other relief as may be necessary and proper under the law.

Respectfully Submitted,

/s/ Joseph M. Olstein  
On Behalf of Debtors

/s/ Joseph M. Olstein

Joseph Olstein ARDC #6300472

10450 S. Western Ave.

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